

Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT TACOMA**

EMPLOYEE PAINTERS' TRUST HEALTH
& WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
DISTRICT COUNCIL NO. 5
APPRENTICESHIP AND TRAINING TRUST
FUND; WESTERN WASHINGTON
PAINTERS LABOR MANAGEMENT
COOPERATION TRUST; INTERNATIONAL
UNION OF PAINTERS AND ALLIED
TRADES INDUSTRY PENSION FUND; and
INTERNATIONAL UNION OF PAINTERS
AND ALLIED TRADES DISTRICT
COUNCIL NO. 5

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN
MARIE FREEMIRE, husband and wife and the
marital community comprised thereof; and
PICTURE PERFECT PAINTING, INC., a
Washington corporation,

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND
RESTORATION, INC.,

Garnishee.

Case No. 3:13-mc-5037-BHS

[Proposed]
**JUDGMENT ON ANSWER OF
GARNISHEE CORTINAS PAINTING
AND RESTORATION, INC. AND
ORDER TO PAY**

(Steven Ray Freemire)

///

Proposed Judgment on Answer of Garnishee
Cortinas Painting and Restoration, Inc. and Order
to Pay (Steven Ray Freemire)
(Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
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P. (425) 646-2394 / (702) 968-8087
F. (425) 462-5638 / (702) 968-8088
murban@theurbanlawfirm.com
Counsel for Plaintiffs

I. JUDGMENT SUMMARY

Judgment Creditors: Employee Painters' Trust Health & Welfare Fund;
Western Washington Painters Defined Contribution Pension Trust; District Council No. 5 Apprenticeship and Training Trust Fund;
Western Washington Painters Labor Management Cooperation Trust;
International Union of Painters and Allied Trades Industry Pension Fund; and
International Union of Painters and Allied Trades District Council No. 5

Garnishment Judgment Debtor (Garnishee): Cortinas Painting and Restoration, Inc.

Garnishment Judgment Amount: \$2,933.58

Costs Judgment Debtor (Defendant): Steven Ray Freemire

Costs Judgment Amount: \$270.07

Attorney for Judgment Creditor: Michael A. Urban, Esq., WA State Bar #20251
Sean W. McDonald, Esq., WA State Bar #48542
800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
P. (425) 646-2394 / (702) 968-8087
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E-mail: murban@theurbanlawfirm.com
smcdonald@theurbanlawfirm.com

II. BASIS

IT APPEARING THAT Garnishee Cortinas Painting and Restoration, Inc. was indebted to Defendant Steven Ray Freemire in the non-exempt amount of \$2,933.58; that at the time the Writ of Garnishment was issued defendant was employed by or maintained a financial institution account with garnishee, or garnishee had in its possession or control funds, personal property, or effects of defendant; and that plaintiff has incurred recoverable costs and attorney fees of \$270.07; now, therefore, it is hereby

III. ORDER

ORDERED as follows:

Proposed Judgment on Answer of Garnishee
Cortinas Painting and Restoration, Inc. and Order
to Pay (Steven Ray Freemire)
(Case No. 3:13-mc-5037-BHS)

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Counsel for Plaintiffs

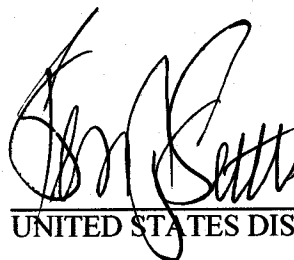
1 1. The Plaintiffs are awarded judgment against Garnishee Cortinas Painting and
2 Restoration, Inc. in the amount of \$2,933.58;

3 2. The Plaintiffs are awarded judgment against Defendant in the amount of \$270.07
4 for recoverable costs, as stated on the writ of garnishment and return of service; and

5 3. Garnishee Cortinas Painting and Restoration, Inc. shall pay its judgment to the
6 Plaintiffs' attorney through the registry of the Court and the Clerk of Court shall note receipt
7 thereof and forthwith disburse such payment to Plaintiffs' attorney.

8 Garnishee is advised that failure to pay this judgment amount may result in execution of the
9 judgment against it, including garnishment.

10 Dated this 11 of February, 2015.

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UNITED STATES DISTRICT JUDGE

15 Submitted by:

16 **THE URBAN LAW FIRM**

17 /s/ Sean W. McDonald
18 Michael A. Urban, Esq., WA State Bar #20251
19 Sean W. McDonald, Esq., WA State Bar #48542
20 800 Bellevue Way NE, Suite 400
21 Bellevue, WA 98004
22 P. (425) 646-2394 / (702) 968-8087
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24 E-mail: murban@theurbanlawfirm.com
25 Attorney for Plaintiffs / Judgment Creditors

26
27
28 Proposed Judgment on Answer of Garnishee
Cortinas Painting and Restoration, Inc. and Order
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murban@theurbanlawfirm.com
Counsel for Plaintiffs

EXHIBIT A

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

EMPLOYEE PAINTERS' TRUST HEALTH &
WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
DISTRICT COUNCIL NO. 5
APPRENTICESHIP AND TRAINING TRUST
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PAINTERS LABOR MANAGEMENT
COOPERATION TRUST; INTERNATIONAL
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Plaintiffs / Judgment Creditors,

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marital community comprised thereof; and
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Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND
RESTORATION, INC.,

Garnishee.

Case No.: MC13-5037BHS

CERTIFICATE OF MAILING

(Garnishment, Continuing Lien
on Earnings of Steven Freemire)

///

Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

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elj@ejmlv.com
Counsel for Plaintiffs

The undersigned STATES that:

1.1 I am a citizen of the State of Nevada, I am over the age of 18 years, and I am not a party to this action.

1.2 On November 25, 2014 at 2:45p.m. at Las Vegas, NV, I mailed to defendant Steven Ray Freemire at P.O. Box 1148 Graham, WA, 98338 by postage prepaid certified mail, return receipt requested or electronic return receipt delivery confirmation requested, the following document(s):

- ☐ Writ of Garnishment (Debts Other Than Earnings)
- ☒ Writ of Garnishment for Continuing Lien on Earnings
- ☒ Judgment Creditor's Writ Application
- ☒ Notice of Garnishment and of Your Rights
- ☒ Exemption Claim
- ☐ Notice to Defendant of Non-Responsive Exemption Claim
- ☐ Other: _____
- ☐ Other: _____

The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic return receipt delivery confirmation is attached to this certification.

1.3 On November 25, 2014 at 2:45p.m. at Las Vegas, NV I mailed to garnishee Cortinas Painting and Restoration, Inc., at 700 Yuma St., Milton, WA 98354, by postage prepaid certified mail, return receipt requested, or electronic return receipt delivery confirmation requested, the following document(s):

- ☐ For debts other than earnings:
 - Writ of Garnishment (Debts Other than Earnings); and
 - Answer to Writ of Garnishment (Debts other than Earnings); and
 - Check or money order made payable to the garnishee in the amount of \$20.00.
- ☒ For Continuing Lien on Earnings:
 - ☒ Writ of Garnishment for Continuing Lien on Earnings; and
 - First Answer to Writ of Garnishment for Continuing Lien on Earnings
 - ☐ Second Answer to Writ of Garnishment for Continuing Lien on Earnings
- ☐ Notice of Default Against Garnishee
- ☐ Other: _____
- ☐ Other: _____

Certificate of Mailing (Garnishment, Continuing Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

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elj@cjmiv.com
Counsel for Plaintiffs

1 The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic
2 return receipt delivery confirmation is attached to this certification.

3 I CERTIFY under penalty of perjury under the laws of the State of Washington that the foregoing is true
4 and correct.

5 Dated: December 15, 2014 at Las Vegas, Nevada.

6 Fees:

7 Service: \$0.00

8 Postage: \$ 13.59

9 Answer Fee: \$ 0.00

10 Total: \$ 13.59

/s/ Krista Taylor-Openbrier

Signature

Krista Taylor-Openbrier, Paralegal

Name and Title

11 Serving the writ of garnishment:

12 Service of the writ of garnishment (debts other than earnings) is invalid unless the writ is
13 served with an answer form and a check or money order made payable to the garnishee in
14 the amount of twenty dollars (\$20) for the answer fee.

15 Service of the writ of garnishment for continuing lien on earnings is invalid unless the
16 writ is served with an answer form.

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Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

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elj@cjmllv.com
Counsel for Plaintiffs

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Cortina's Painting and
Restoration, Inc.
700 Yuma St.
Milton, WA 98354

2. Article Number

(Transfer from service label)

91 7199 9991 7033 1405 7417

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Willie Cortina

C. Date of Delivery

12-2-14

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☒ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Steven Ray Freemire
P.O. Box 1148
Graham, WA 98338

2. Article Number

(Transfer from service label)

91 7199 9991 7033 1405 7488

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X / Steven Ray Freemire

☐ Agent☐ Addressee

B. Received by (Printed Name)

Joan Freemire

C. Date of Delivery

8-10-14

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☒ No

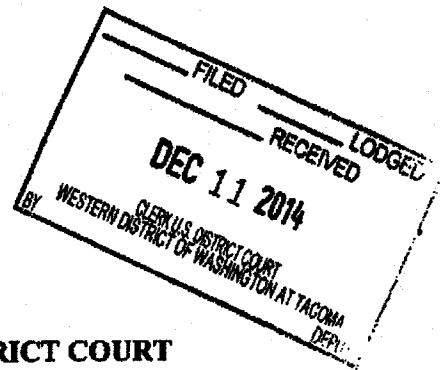
3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

EXHIBIT B



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT TACOMA**

**EMPLOYEE PAINTERS' TRUST HEALTH
& WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
DISTRICT COUNCIL NO. 5
APPRENTICESHIP AND TRAINING TRUST
FUND; WESTERN WASHINGTON
PAINTERS LABOR MANAGEMENT
COOPERATION TRUST; INTERNATIONAL
UNION OF PAINTERS AND ALLIED
TRADES INDUSTRY PENSION FUND; and
INTERNATIONAL UNION OF PAINTERS
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marital community comprised thereof; and
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Washington corporation,**

Defendants / Judgment Debtors,

and

**CORTINAS PAINTING AND
RESTORATION, INC.,**

Garnishee.

Case No.: MC13-5037BHS

**FIRST ANSWER TO WRIT OF
GARNISHMENT FOR CONTINUING LIEN
ON EARNINGS**

(Steven Freemire)

13-MC-05037-ANS

13-MC-05037-ANS

**THE URBAN LAW FIRM
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clj@cjmiv.com
Counsel for Plaintiffs**

SECTION I. If you are withholding the defendant's nonexempt earnings under a previously served writ for a continuing lien, answer only sections I and III of this form and mail or deliver the forms as directed in the writ. Withhold from the defendant's future nonexempt earnings as directed in the writ, and a second set of answer forms will be forwarded to you later.

If you are NOT withholding the defendant's earnings under a previously served writ for a continuing lien, answer this ENTIRE form and mail or deliver the forms as directed in the writ. A second set of answer forms will be forwarded to you later for subsequently withheld earnings.

ANSWER: I am presently holding the defendant's nonexempt earnings under a previous writ served on _____ (date) that will terminate not later than _____ (date).

On the date the writ of garnishment was issued as indicated by the date appearing on the last page of the writ:

(A) The defendant: (check one) ☒ was, [] was not employed by garnishee. If not employed and you have no possession or control of any funds of defendant, indicate the last day of employment: _____; and complete section III of this answer and mail or deliver the forms as directed in the writ;

(B) The defendant: (check one) [] did, ☒ did not maintain a financial account with garnishee; and

(C) The garnishee: (check one) [] did, ☒ did not have possession of or control over any funds, personal property, or effects of the defendant. (List all of defendant's personal property or effects in your possession or control on the last page of this answer form or attach a schedule if necessary.)

SECTION II. At the time of service of the writ of garnishment on the garnishee there was due and owing from the garnishee to the above-named defendant \$ 0.

This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable earnings (that is, compensation payable for personal services, whether called wages, salary, commission,

First Answer to Writ of Garnishment for
Continuing Lien on Earnings (Steven Freemire)
(Case No. MC13-5037BHS)

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elj@cjmiv.com
Counsel for Plaintiffs

bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or retirement program). Calculate the attachable amount as follows:

Gross Earnings \$ 1200.00 (1)

Less deductions required by law
(social security, federal withholding tax, etc.
Do not include deductions for child support orders
or government liens here. Deduct child support orders
and liens on line 7):

\$ 198.77 (2)

Disposable Earnings
(subtract line 2 from line 1):

\$ 1001.23 (3)

Enter seventy-five percent (75%) of line 3:

\$ 750.93 (4)

Enter one of the following exempt amounts*:

If paid Weekly \$253.75 Semi-monthly \$507.50
Bi-Weekly \$507.50 Monthly \$1,015.00

\$ 253.75 (5)

*These are minimum exempt amounts that the defendant must be paid. If your answer covers more than one pay period, multiply the preceding amount by the number of pay periods and/or fraction thereof your answer covers. If you use a pay period not shown, prorate the monthly exempt amount.

Subtract the larger of lines 4 and 5 from line 3:

\$ 250.30 (6)

Enter amount (if any) withheld for ongoing government liens such as child support:

\$ 0 (7)

Subtract line 7 from line 6. This amount must be held out for the plaintiff:

\$ 250.30 (8)

This is the formula that you will use for withholding each pay period over the required sixty day garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be paid to the defendant.

If there is any uncertainty about your answer, give an explanation on the last page or on an attached page.

First Answer to Writ of Garnishment for
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clj@cjmllv.com
Counsel for Plaintiffs

SECTION III. An attorney may answer for the garnishee.

Under penalty of perjury, I affirm that I have examined this answer, including accompanying schedules, and to the best of my knowledge and belief it is true, correct, and complete.

Signature of Garnishee Defendant

Date

12/8/14

Signature of Person Answering for Garnishee

Connection with Garnishee

Office Manager

Print Name of Person Signing

Address of Garnishee

Tessie J. Cruz

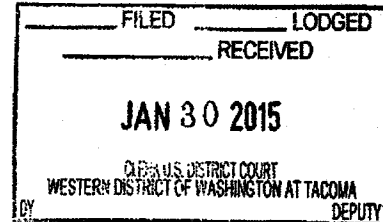
700 Yuma St. Milton, WA 98354

If necessary, use this space to supplement your answer from the first and second pages:

First Answer to Writ of Garnishment for
Continuing Lien on Earnings (Steven Freemire)
(Case No. MC13-5037BHS)

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elijah@cjmlv.com
Counsel for Plaintiffs

EXHIBIT C



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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

EMPLOYEE PAINTERS' TRUST HEALTH
& WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
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and

CORTINAS PAINTING AND
RESTORATION, INC.,

Garnishee.

Case No.: MC13-5037BHS

SECOND ANSWER TO RENEWED WRIT
OF GARNISHMENT FOR CONTINUING
LIEN ON EARNINGS

(Steven Freemire)

Second Answer to Renewed Writ of Garnishment
for Continuing Lien on Earnings (Steven
Freemire)
(Case No. MC13-5037BHS)

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etj@cjmlv.com
Counsel for Plaintiffs

1 **SECTION I. ANSWER SECTION II OF THIS FORM WITH RESPECT TO THE TOTAL AMOUNT**
 2 **OF EARNINGS WITHHELD UNDER THIS GARNISHMENT, INCLUDING THE AMOUNT, IF**
 3 **ANY, STATED IN YOUR FIRST ANSWER, AND WITHIN TWENTY DAYS AFTER YOU**
 4 **RECEIVE THESE FORMS, MAIL OR DELIVER THEM AS DIRECTED IN THE WRIT.**

5 Nonexempt amount due and owing stated in the first answer \$ 0

6 Nonexempt amount accrued since the first answer \$ 2933.58

7 TOTAL AMOUNT WITHHELD \$ 2933.58

8 **SECTION II. At the time of service of the writ of garnishment on the garnishee there was due and**
 9 **owing from the garnishee to the above-named defendant \$** 0.

10 This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable
 11 earnings (that is, compensation payable for personal services, whether called wages, salary, commission,
 12 bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or
 13 retirement program). Calculate the attachable amount as follows:

14 Gross Earnings \$ 1200.00 (1)

15 Less deductions required by law
 16 (social security, federal withholding tax, etc.
 17 Do not include deductions for child support orders
 18 or government liens here. Deduct child support orders
 19 and liens on line 7): \$ 198.08 (2)

18 Disposable Earnings
 19 (subtract line 2 from line 1): \$ 1001.92 (3)

20 Enter seventy-five percent (75%) of line 3: \$ 751.44 (4)

21 Enter one of the following exempt amounts*: \$ 253.75 (5)

If paid Weekly \$253.75 Semi-monthly \$507.50
 Bi-Weekly \$507.50 Monthly \$1,015.00

22 *These are minimum exempt amounts that the defendant must
 23 be paid. If your answer covers more than one pay period,
 24 multiply the preceding amount by the number of pay periods
 and/or fraction thereof your answer covers. If you use a pay
 period not shown, prorate the monthly exempt amount.

25 Subtract the larger of lines 4 and 5 from line 3: \$ 250.48 (6)

Second Answer to Renewed Writ of Garnishment
 for Continuing Lien on Earnings (Steven
 Freemire)
 (Case No. MC13-5037BHS)

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 Counsel for Plaintiffs

1 Enter amount (if any) withheld for ongoing
2 government liens such as child support:

\$ 0 (7)

3 Subtract line 7 from line 6. This amount
4 must be held out for the plaintiff:

\$ 250.48 (8)

5 This is the formula that you will use for withholding each pay period over the required sixty day
6 garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be
7 paid to the defendant.

8 If there is any uncertainty about your answer, give an explanation on the last page or on an attached
9 page.

10 **SECTION III. An attorney may answer for the garnishee.**

11 Under penalty of perjury, I affirm that I have examined this answer, including accompanying schedules,
12 and to the best of my knowledge and belief it is true, correct, and complete.

14 Signature of Garnishee Defendant

1/28/15
Date

16 Signature of Person Answering for Garnishee

Office Manager
Connection with Garnishee

18 Tessie J. Cruz
19 Print Name of Person Signing

700 Yuma St. Milton, WA 98354
Address of Garnishee

21 If necessary, use this space to supplement your answer from the first and second pages:
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Second Answer to Renewed Writ of Garnishment
for Continuing Lien on Earnings (Steven
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Council for Plaintiffs

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Counsel for Plaintiffs